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8 Counsel for Defendant  
 9 DREW DESBORDES

10  
 11 UNITED STATES DISTRICT COURT  
 12 NORTHERN DISTRICT OF CALIFORNIA

13  
 14 ASHLEY PARHAM, JANE DOE, and  
 15 JOHN DOE,

16 Plaintiffs,

17 vs.

18 SEAN COMBS, KRISTINA  
 19 KHOORAMN, SHANE PEARCE,  
 RUBEN VALDEZ, JOHN  
 PELLETIER, ODELL BECKHAM JR.,  
 DREW DESBORDES, JACQUELYN  
 WRIGHT, HELENA HARRIS-SCOTT,  
 MATIAS GONZALEZ, BRANDI  
 CUNNINGHAM, JANICE COMBS,  
 KEITH LUCKS, and JOHN AND  
 JANE DOES 1-10,

20 Defendants.

21 Case No. 3:24-CV-07191-RFL  
 22 Assigned to Hon. Rita F. Lin  
 23  
**24 DECLARATION OF DREW  
 25 DESBORDES**

26 Date: June 17, 2025  
 Time: 10:00 a.m.  
 Crtrm: 15

27 Complaint Filed: 10/15/24

## **DECLARATION OF DREW DESBORDES**

I, Drew Desbordes, declare:

3       1. I am a named defendant in the above-captioned lawsuit. I have  
4 personal knowledge of all of the following facts and, if called as a witness, could  
5 and would competently testify thereto.

6       2. I read Plaintiff's Amended Complaint. Plaintiff alleged that she was  
7 attacked on March 23, 2018 by a group of men, including me, in Orinda, California.  
8 Plaintiff's allegations against me are false.

9       3.     I have never met Plaintiff. I have never been to Orinda, California. I  
10 was not in Orinda, California on March 23, 2018. On that date – and all of March  
11 2018 – I was in Georgia, not California.

12        4.     In March 2018, I was twenty-three years old. I was living in my  
13 mother's home in Duluth, Georgia. I was working as a waiter in local restaurants. I  
14 was not a celebrity.

15       5. Plaintiff's allegations state that the group of men who attacked her  
16 included a number of other public figures. I knew none of them in 2018.

17       6. I have attached as **Exhibit 1** to my declaration a true and correct copy  
18 of my Bank of America checking account statement for March 10, 2018, to April 9,  
19 2018. The statement reflects that, on March 23, 2018, I purchased gas at a Shell  
20 station located in Loganville, Georgia. All of my ATM and debit-card transaction  
21 reflected on the statement occurred in Georgia.

22       7. I have attached as **Exhibit 2** to my declaration a true and correct copy  
23 of a screenshot of my Instagram account dated June 12, 2018 at 7:50 PM. As of that  
24 date, which is months after the alleged incident, I had 2,534 Instagram followers.

25 8. I have attached as **Exhibit 3** to my declaration a true and correct copy a  
26 photograph dated March 10, 2018 at 9:23 PM. The photograph shows that I

1 completed an escape room with my mother and sisters at Breakout Games in  
2 Atlanta, Georgia on that date.

3 9. I have attached **Exhibit 4** to my declaration a true and correct copy of a  
4 photograph dated April 1, 2018 at 4:09 PM. The photograph shows I ate lunch with  
5 my extended family at the Cracker Barrel in Snellville, Georgia on that date.

6 10. I have attached as **Exhibit 5** to my declaration a true and correct copy  
7 of my Equifax Employment Data Report showing Employer Information for  
8 Outback Steakhouse. As confirmed by the report, during March 2018, I worked as a  
9 server at Outback Steakhouse.

10 11. I have attached as **Exhibit 6** to my declaration a true and correct copy  
11 of my Equifax Employment Data Report showing Employer Information for Darden  
12 Restaurants, Inc., which owns Longhorn Steakhouse. As confirmed by the report,  
13 during March 2018 I interviewed for, and received, a job at Longhorn Steakhouse in  
14 Johns Creek, Georgia.

15 12. I have attached as **Exhibit 7** to my declaration a true and correct copy  
16 of an email dated March 23, 2018, from DONOTREPLY@darden.com to me. I had  
17 interviewed for a job as a server at Longhorn Steakhouse and, as confirmed by this  
18 email, the Longhorn Steakhouse asked me to complete my new hire forms before  
19 starting my first day of work.

20 13. I have attached as **Exhibit 8** to my declaration a true and correct copy  
21 of a letter from Darden Restaurants, Inc. As reflected in the letter, my “Most Recent  
22 Start Date” at Longhorn Steakhouse was “03/25/2018.” I did begin working at  
23 Longhorn Steakhouse in Johns Creek, Georgia, on March 25, 2018.

24 14. I have attached as **Exhibit 9** to my declaration a true and correct copy  
25 of a photograph dated April 2, 2018. As reflected in the photograph, I took a  
26 photograph outside my mother’s house, where I was living, in Duluth, Georgia. I  
27 took the photograph to show my mother that the trash collectors had been leaving  
28 garbage on the property after the weekly trash removal.

1       15. I have attached as **Exhibit 10** to my declaration a true and correct copy  
2 of my telephone call activity records provided by Verizon. The phone bill is under  
3 my mother's name, but the number listed is the number I used in 2018. These  
4 records show that from March 19, 2018 to March 30, 2018, all calls made by me  
5 originated in Georgia.

6       16. I have attached as **Exhibit 11** to my declaration a true and correct copy  
7 of a current telephone bill (covering February 27, 2025 to March 26, 2025) provided  
8 by Verizon. The bill shows that I still have the same telephone number that I was  
9 using in 2018.

10       I declare under penalty of perjury under the laws of the United States of  
11 America that the foregoing is true and correct.

12       Executed on April 17<sup>th</sup>, 2025, at Los Angeles CA.

13         
14       Drew Desbordes